



December 15, 2021

**VIA ECF**

The Hon. Vernon S. Broderick  
United States District Judge  
Thurgood Marshall  
United States Court House  
40 Foley Square  
New York, New York 10007

**APPLICATION GRANTED**

**SO ORDERED** *[Signature]*

**VERNON S. BRODERICK**

**U.S.D.J. 12/15/21**

The Clerk of Court is directed to maintain the document referenced herein (Doc. 96) under seal. The Clerk of Court is also directed to close the open motions at docket numbers 93 and 98.

**Re:** *Stanley Johnson, et al. v. M.A.C. Cosmetics, Inc., et al* (Case No.: 18-cv-09157)  
Request for Leave to File Under Seal

Dear Judge Broderick:

Undersigned counsel submits this letter on behalf of Plaintiffs Stanley Johnson, *et al.* (“Plaintiffs”) in the above-referenced action. In accordance with your Honor’s Individual Rules & Practices, Rule 5.B, Plaintiffs respectfully request to file certain documents under seal. Specifically, Plaintiffs respectfully request permission to file Exhibit C to the Declaration of Salvatore C. Badala in support of the Letter for Approval of Settlement.

This document contains information that Plaintiffs designate as “Confidential,” and/or “attorney’s work product” as it includes contemporaneous time records showing the amount of time spent by Plaintiffs’ attorneys and the professional support staff who were involved in the case, including details of communications between Plaintiffs and Plaintiffs’ counsel, in addition to the total lodestar.

We therefore respectfully request your approval to file Exhibit C under seal pursuant to your Honor’s Individual Rules & Practices and the procedures of the Sealed Records Department of the Southern District of New York.

Respectfully submitted,

/s/ Salvatore C. Badala



CERTIFICATE OF SERVICE

The undersigned attorney certifies that on December 15, 2021, he electronically filed a copy of the attached via the CM/ECF filing system, which sent notification of such filing to all Filing Users.

/s/ Salvatore C. Badala